

U.S. Application No.: 09/766,949

Attorney Docket No.: OID06-36(07601)

Page 8 of 12

**REMARKS**

Applicants thank the Examiner for examining the application. Claims 1-13, 15-31, and 41-50 are now pending.

*Claim Rejections – 35 U.S.C. § 103(a)*

The Examiner rejected claims 1-13, 15-31, and 41-50 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 5,909,678 to Bergman et al. in view of U.S. Patent No. 6,122,647 to Horowitz et al.

Applicants' independent claim 1 requires, among other things, displaying a hyperlink for an element in the form, to indicate to a user that a control is available for the element, said hyperlink including a reference to a Universal Resource Locator (URL), said hyperlink providing one of the group consisting of a link from the form to another location, and a link from the form to another file. The Examiner cited to Fig. 9 element 911; col. 3 lines 17-18; Fig. 4 element 200; col. 3 lines 6-28, 46-49, and 57-67; col. 4 lines 1-9; and col. 7 lines 31-44 of Bergman et al. as disclosing the entity of the limitation with the exception of "said hyperlink including a reference to a Universal Resource Locator (URL)", which, as the Examiner himself admits, is not taught by Bergman et al. For this, the Examiner cites to col. 10 lines 28-67 and col. 11 lines 1-2 of Horowitz et al.

With all due respect to the Examiner, Applicants strongly disagree with this argument. The entirety of the prosecution of this application has focused on the meaning of the term "hyperlink". Throughout the prosecution, the Examiner has continually argued that Bergman et al. somehow disclosed a hyperlink. Applicants have maintained from the beginning that hyperlinks are not found in Bergman et al., and that the phrase receptacles taught by Bergman et al., on which the Examiner continues to rely for his rejection, are not hyperlinks.

In this most recent Office Action, the Examiner argues that, according to Bergman et al., "selecting a given phrase receptacle enforces semantic constraints that link to the appropriate phrase and objects in the different menu boxes", Office Action page 3. However, as Applicants have argued previously, Bergman et al. does not

U.S. Application No.: 09/766,949

Attorney Docket No.: OID06-36(07601)

Page 9 of 12

disclose such a link, which, with the exception of the URL component, the Examiner again indicates is a hyperlink, despite Applicants' numerous arguments to the contrary.

When a user operating the system of Bergman et al. selects a phrase receptacle, such as by clicking on it, if the phrase receptacle truly were a hyperlink, as the Examiner posits, the user should be taken to a link target, which Applicants' independent claim 1 requires to be a Uniform Resource Locator. However, what actually happens is that "the user may click on any empty receptacle displayed on the palette and see the phrase and objects that the palette will accept highlighted in the menu boxes." Bergman et al. col. 7 lines 38-41 (emphasis added). There is no link target, as required by Applicants' use the term "hyperlink". Rather, possible entries for the receptacle, which are shown elsewhere on the display, *see at least* Fig. 2 elements 11 and 12 of Bergman et al., are highlighted if a user clicked on the phrase receptacle and the phrase receptacle was empty. This is the only instance in which Bergman et al. teaches or suggests that a phrase receptacle may be clicked on. The lack of any kind of link target, be it a URL or otherwise, makes clear that the phrase receptacle taught by Bergman et al. is not a hyperlink. The fact that, according to Bergman et al., to perform the action which the Examiner equates to hyperlinking, the phrase receptacle must be empty, when an actual hyperlink as required by Applicants' independent claim 1 includes no such limitation, only strengthens Applicants' argument.

Indeed, Applicants note that the word "hyperlink" not only does not appear anywhere in Bergman et al., any variation of the word "link" alone appears only twice in Bergman et al., and each time it is used in conjunction with the word communication, i.e., the phrase used is "communication links". Applicants have gone through Bergman et al. with a fine tooth comb, and have failed to find ANY teaching or suggestion of a hyperlink, or any occurrence of any synonym of the word "link", or any variation on that word or any of its synonyms, that might, read as broadly as possible, suggest hyperlinking as required by Applicants' independent claim 1.

Further, Applicants respectfully note that, because Bergman et al. does not teach a hyperlink that links to any kind of link target, it is improper to suggest that Bergman et

U.S. Application No.: 09/766,949

Attorney Docket No.: OID06-36(07601)

Page 10 of 12

al. may be combined with any reference that specifically teaches a URL as a link target, such as Horowitz et al. does.

Finally, one of the Examiner's suggested motivations for the obviousness of combining Bergman et al. with Horowitz et al. bears repeating in Applicants' opinion. The Examiner states that "its was notoriously well known in the art at the time of the invention that URL's were utilized to access information from across the World Wide Web," Office Action page 3. Applicants agree, which is why it is very curious to Applicants that Bergman et al. does not mention URLs at all. After all, if the phrase receptacle taught by Bergman et al. did involve a hyperlink, as the Examiner continues to suggest, why wouldn't the inventors of Bergman et al., all people of at least ordinary skill in the art – not to mention employees of one of the largest computer companies in the world - and thus quite aware of URLs, fail to mention URLs in their patent application? Applicants suggest it is because there are no hyperlinks taught or suggested by Bergman et al.

Further, the Examiner goes on to suggest that by using URLs, "Bergman et al. would have been provided the obvious benefit of being able to access data to be inserted into the phrase receptacles from a plurality of different locations outside the user computer (Fig. 9)", Office Action pages 3-4. However, this line of reasoning ignores the fact that Bergman does not teach or suggest acquiring such data from anywhere other than the databases disclosed in Bergman et al., and that Bergman et al. does not teach or suggest that such databases should be accessible over any type of computer network such as the Internet, one or more LANs, etc. Again, given the wealth of knowledge at the time regarding hyperlinks, URLs, and the vast resources available through use of hyperlinks with URLs, Applicants strongly believe the only logical reason for Bergman et al. to not even vaguely suggest using URLs is because the phrase receptacles of Bergman et al. are not hyperlinks.

In summary, Bergman et al. does not teach or suggest displaying a hyperlink for an element in the form, to indicate to a user that a control is available for the element, said hyperlink including a reference to a Universal Resource Locator (URL), said

U.S. Application No.: 09/766,949

Attorney Docket No.: OID06-36(07601)

Page 11 of 12

hyperlink providing one of the group consisting of a link from the form to another location, and a link from the form to another file, as required by Applicants' independent claim 1. Thus, the combination of Bergman et al. with Horowitz et al. fails to teach or suggest Applicants' independent claim 1, and therefore Applicants' independent claim 1 is allowable over the combination of Bergman et al. with Horowitz et al.

Applicants' independent claims 11, 13, and 41 all include limitations similar to those of Applicants' allowable independent claim 1. Therefore, for at least the reason(s) given above with regards to Applicants' allowable independent claim 1, Applicants' independent claims 11, 13, and 41 are themselves not obvious in light of Bergman et al. in view of Horowitz et al., and thus, Applicants' independent claims 11, 13, and 41 are allowable over the combination of Bergman et al. with Horowitz et al.

Applicants' dependent claims 2-10, 12, 14-31, and 42-50 depend from, respectively, Applicants' allowable independent claims 1, 11, 13, and 41. Therefore, for at least the reason(s) given above with regards to Applicants' allowable independent claims 1, 11, 13, and 41, Applicants' dependent claims 2-10, 12, 14-31, and 42-50 are themselves not obvious in light of Bergman et al. in view of Horowitz et al., and thus, Applicants' dependent claims 2-10, 12, 14-31, and 42-50 are allowable over the combination of Bergman et al. with Horowitz et al.

### **CONCLUSION**

Applicants believe this Amendment and Response to be fully responsive to the present Office Action. Thus, based on the foregoing Remarks, Applicants respectfully submit that this application is in condition for allowance. Accordingly, Applicants request allowance of the application.

Applicants hereby petition for any extension of time required to maintain the pendency of this case. If there is any fee occasioned by this response that is not paid, please charge any deficiency to Deposit Account No. 50-3735.

U.S. Application No.: 09/766,949

Attorney Docket No.: OID06-36(07601)

Page 12 of 12

Should the enclosed papers or fees be considered incomplete, Applicants respectfully request that the Patent Office contact the undersigned collect at the telephone number provided below.

Applicants invite the Examiner to contact the Applicants' undersigned Attorney if any issues are deemed to remain prior to allowance.

Respectfully submitted,



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Attorney Docket No.: OID06-36(07601)

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